

HAZARDOUS WASTE DETERMINATION RECORD

April 24, 1997

I. WASTE STREAM

Personal protective clothing and possibly wipes generated during sampling activities in and adjacent to the CFA-04 pond in support of the OU 4-13 Comprehensive RI/FS, scheduled to commence on 5/12/97.

II. WASTE DESCRIPTION

Waste generated during sampling at the CFA-04 pond (i.e. wipes and PPE).

III. WASTE QUANTITY: One bag per day of sampling.

IV. WASTE STORAGE LOCATION: Waste generated during sampling will be disposed of daily and will not be stored.

I. HAZARDOUS WASTE DETERMINATION:

1. **SOLID WASTE?:** Yes. The waste generated during sampling are solid wastes under the definition of 40 CFR 261.2. Per 40 CFR 261.2 (b) *Materials are solid waste if they are abandoned by being: (3) Accumulated, stored, or treated (but not recycled) before or in lieu of being abandoned by being disposed of, burned, or incinerated.*

2. **EXCLUDED UNDER 40 CFR 261.4?:** No. This waste does not meet the exclusion requirements under 40 CFR 261.4.

3. **LISTED RCRA WASTE UNDER 40 CFR 261 SUBPART D?:** No. Based on analytical results (attached) from the personal protective clothing worn during the excavation of mercury contaminated soils in the same area during the OU 4-05 non-time critical removal action, no listed waste under 40 CFR 261 Subpart D is contained in the waste.

4. **WASTE IDENTIFIED UNDER 40 CFR 261 SUBPART C?:** No. The waste generated during sampling activities at CFA-04 are not characteristic under 40 CFR 261 Subpart C. This determination is based on analytical results (attached) from PPE generated during the OU 4-05 removal action (mercury retort project).

V. WASTE TREATMENT/DISPOSAL DETERMINATION

The PPE are determined to be nonhazardous based on analytical results obtained during the OU 4-05 removal action. Waste generated during the sampling process, (i.e. wipes and PPE) will be removed from the site daily and disposed by the RCTs at the CFA Landfill (personnel conversation between P.J. Jessmore - ER and John Marthis - CFA). This area is no longer posted as a radiation area.

WASTE DETERMINATION PROVIDED

BY: Peggy Jessmore 4/24/97

WASTE DETERMINATION REVIEWED

BY: Dale Dwyer 4-30-97
LMITCO Environmental Affairs

WASTE DETERMINATION APPROVED

BY: Roger Jones 4/28/97
Roger Jones, LMITCO ES&H Manager



MATERIAL AND WASTE CHARACTERIZATION GENERATOR'S CERTIFICATION AND INFORMATION

FORM L-0669.1#
(Rev. 01-96)

Receiving Organization Use Only:

Approved by: Signature: L.H. Shepherd Printed Name: L.H. Shepherd
RWMC ☒ WROC ☐ TAN ☐ Pollution Prevention
Characterization ID No. 1969 Content Code(s) 25 2H Date: 4/25/96

A. Generator's Certification

I certify that the information in this form L-0669# and attachments is true and accurate. I have put forth a good faith effort to acquire and verify the information used to complete this characterization. Willful and deliberate omissions have not been made. All known and suspected hazards have to the best of my knowledge been disclosed.

Generator certifier signature: Julie Sherwood Printed Name: Julie Sherwood Title: Se Engr/Sci Date: 4/4/96
Phone: 6-9369 Mailstop: 3953 Facsimile No: 6-9473 E. Mail ID: JS9
Generating Facility: Mercury Retort Building: NA Organization: 3150

B. General Information

1. ☒ Yes ☐ No Will material and waste characterization be fully capable of complying with applicable RRWAC Subsection?

If "No", receiving organization approval and completion of the following is required:

a. INEL-RRWAC requirement(s) not met (list each): _____

b. Receiving organization approval letter number for nonstandard material or waste: _____

Contact	Name	E. Mail ID	Phone	Pager	Mailstop	Charge Number
2. Generator	Julie Sherwood	JS9	6-9369	—	3953	3XCC113DC
3. Technical	Scott Francis	CSF	6-9562	6865	3954	—

4. Material or waste type and 4.3.3 Conditional Sanitary Waste to be Disposed at the INEL Landfill Complex
5. Common name of material: Non-training related anti-C clothing, respirator cartridges, and box liners
6. Rate of generation: ☐ One time only: Liquid ☐ gal Solid ☐ lb or ☐ ft³ ☐ m³
☒ On-going: Liquid ☐ gal/yr Solid ☐ lb or 1730 ft³/yr ☐ m³/yr
7. Generating process description: CERCLA driven removal action and treatment of mercury contaminated soil. Used PPE and box liners generated during treatment is not CERCLA regulated waste (non-hazardous).
8. Packaging Description: See-through plastic bags Empty package weight 0 lb.
9. Physical state at 70°F (solid, liquid, sludge, gel, etc):
10. ☐ Yes ☒ No Does material contain free liquids?
11. ☒ Yes ☐ No Current waste minimization plan?
12. Indicate all that apply: ☐ CERCLA ☐ Scrap metal ☐ OSHA carcinogen ☐ PCB ≥ 50 ppm ☐ Etiologic agent
☐ Nonfriable asbestos ☐ FIFRA ☐ Unused material ☐ Used oil ☐ Aerosol cans ☐ Compressed gas cylinders
☐ Friable asbestos ☐ Soil ☒ Debris ☐ Spill cleanup ☐ Wastewater ☐ Classified material
☐ ≤ 100 PPM VOCs ☐ Accountable nuclear material
13. ☐ Yes ☒ No Is this DOT regulated hazardous material? If yes, identify DOT primary hazard: _____
and DOT subsidiary _____



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14. ☐ Yes ☒ No At the point of generation did this material contain any RCRA "F", "K", "U", OR "P" Listed waste either in pure form, as a mixture, or as a treatment residue (i.e., ash, leachate, spill cleanup), or "D" Characteristic waste? If yes give applicable EPA and EPA Hazardous Waste Numbers and attach applicable LDR notification and certification: (40 CFR 261) _____, and attach applicable LDR notification and certification.
15. For mixed waste, if the Characterization ID NO is different than the INEL Site Treatment Plan Waste Stream (STP) ID NO the STP ID _____ No. is _____
- ☐ Yes ☐ No Is Section C1, Physical Characteristics of Material, not required by the GI?
- ☐ Yes ☐ No Is Section C2, Chemical Characteristics of Material, not required by the GI?
16. ☐ Yes ☒ No Does the GI require radiological characterization? If yes, complete Section C3, Radiological Characteristics of Material, per GI instructions.
17. ☐ Yes ☒ No Is this a lab pack? If yes, complete Item D, Lab Pack Inventory List.
18. ☐ Yes ☒ No Does the GI require any additional information? If yes, see instructions.
19. ☒ Yes ☐ No Is supporting documentation submitted? If yes, list: TCLP analysis

Table 4. Operable Unit 1-08/4-05 Secondary Waste Stream Characterization - Mercury Retort Process Data.

LITCO Sample Results								ETAS Sample Results
Sample number ^a	Media	Date Sampled	Container number	Constituent ^b	Concentration	Regulatory level or project goal ^c	Data validation flag ^d	Comment
45251101H3	solid waste	12-19-95	OU 4-05/ OU 1-08 drum liners	TCLP mercury	0.125 mg/L	0.2 mg/L	none	
45252101H3	solid waste	12-19-95	OU 4-05/ OU 1-08 box liners	TCLP mercury	0.00083 mg/L	0.2 mg/L	none	
45253101H3	solid waste	12-19-95	OU 4-05/ OU 1-08 PPE	TCLP mercury	0.00010 mg/L	0.2 mg/L	R	
45254101H3	solid waste	12-19-95	OU 4-05/ OU 1-08 Cartridges	TCLP mercury	0.025 mg/L	0.2 mg/L	none	
45255101H3	solid waste	12-19-95	OU 4-05/ OU 1-08 Pond Liner	TCLP mercury	0.0021 mg/L	0.2 mg/L	none	
45254101HG	solid/ calcine	2-23-96	Box # VRU-1	Total Mercury	145 mg/kg			
45254101TI				TCLP metals				
				Arsenic	78.6 ug/l			
				Barium	117 ug/l			
				Cadmium	2.7 ug/l		U	
				Chromium	564 ug/l			
				Lead	32.7 ug/l		U	
				Mercury	668 ug/l			
				Selenium	34.3 ug/l		U	
				Silver	8.6 ug/l		U	
45254101RB				Sr-90	(2.30±0.30)E+00 pCi/g			
45254101R4	Retreated sludge from vapor recovery skid			Gamma				
				Cs-137	(2.42±0.10)E+00 pCi/g			
				Zr-95	(1±4)E-02 pCi/g		U	
				Nb-95	(5±2)E-02 pCi/g		U	
				Ru-103	(2±2)E-02 pCi/g		U	
				Ru/Rh-106	(2.5±1.6)E-01 pCi/g		U	
				Ce-144	(-3±14)E-02 pCi/g		U	
				Eu-152	(-1.3±0.5)E-01 pCi/g		U	
				Eu-154	(2.0±0.6)E-01 pCi/g		U	
45254101R9				U-234	(8.1±0.7)E-01 pCi/g			
				U-235	(4.3±1.2)E-02 pCi/g			
				U-238	(1.12±0.09)E+00 pCi/g			

To: LS4	--INELVM1	L H Shepherd			
cc: JS9	--INELVM1	J A Sherwood	CSF	--INELVM1	C S Francis
WRA	--INELVM1	P M Wraught	SEN	--INELVM1	J R Jansen
EWG	--INELVM1	L E Ewing	WSJ	--INELVM1	J S Williams

FROM: LESTER H SHEPHERD (L.H.)
 526-8019 M.S.8102 PBF-601
 WROC-TP PROFS ID--LS4

Subject: NOTE TO FILE-WASTE I.D. 1969

This waste stream consists of non-training related anti-C clothing, respirator cartridges, and box liners from TAN's Mercury Tetort facility. This waste was generated from a CERCLA action Investigation Derived cleanup to remove mercury contaminated soil from a specific area. Analysis indicates this waste stream is not RCRA regulated (non-hazardous).

In discussing the intent of approving/disposing this waste stream in our Commercial/Industrial Landfill with Dick Jansen, he suggested I get concurrence from Bob Montgomery that we would not be violating regulations/requirements/policy in this action. Per telecon with Bob Montgomery, 4/25/96, he concurred the disposal of this "investigation derived" waste that analysis indicates is not RCRA hazardous and is only industrial waste, would not be in violation of any rules, regulation, requirements, or policies by disposing in our "on-site" landfill.

Per the above confirmation, I am approving WROC Waste I.D. 1969 for disposal as conditional waste, and will complete the distribution of the approved forms to the generator.

Thanks, L.H.